MISSOURI DEPARTMENT OF
HEALTH &
SENIOR SERVICES

Division of Cannabis Regulation

Item Submission Guide

Section for Compliance and Enforcement

SEPTEMBER 2025

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Introduction

The Division of Cannabis Regulation (DCR) implemented the Item Approval Process on Sept. 1, 2023, per 19 CSR 100-1.120(2) for final marijuana product. This process requires licensees to submit all designs for marijuana packaging, labeling and product to DCR for a compliance review with 19 CSR 100-1.120(1), prior to use. The Item Approval Process is in place to ensure products and packaging are designed in a manner that protects public health. This guide assists licensees in completing submission of an item in the Item Approval Process. Reference the *Packaging, Labeling and Product Design Guide* for information regarding clarification of rule, law and statute.

Overview

Prior to use, a licensee submits an item's packaging, labeling and product design for review through submission into the statewide track and trace system (Metrc) and the product compliance team's email, CannabisProductCompliance@health.mo.gov.

Within **30 days of submission**, DCR will review the submission to determine if it is complete. If a submission is determined to be incomplete, DCR will identify the reasons the submission is incomplete and inform the licensee the submission is denied. When a submission is determined to be complete, DCR will review for compliance with 19 CSR 100-1.120(1).

Within **60 days of receiving a complete submission**, DCR will review and approve or deny. If the submission is approved, DCR will issue an approval number for the packaging, labeling and product design. If the submission is denied, the item will be denied in Metrc and DCR will email the licensee a list of deficiencies.

After an item's packaging, labeling and product design is approved in Metrc through the Item Approval Process, a licensee will use the approved item in Metrc each time the marijuana product is produced by selecting the appropriate "Final Packaging" item that corresponds to the product. It is the licensee's responsibility to ensure the marijuana product, packaging and labeling for the item is identical to the information provided within the submission.

Submission Options

Licensees have **three** options for submission through the Item Approval Process. The three options are Template Item submission, Non-Template Item submission and Template-Based Item submission which are described below:

Template Item Submission

A Template Item is a type of Metrc item that is not intended to be used for the purpose of retail sales. A Template Item is the first step in the Template-Based Item Approval Process. This type of submission has a review period of up to 60 days. Before a Template-Based Item may be submitted for DCR approval, the licensee must have an existing approved Template Item in the Metrc Item Library to reference.

This template design will be the basis for shared sets of information and layouts with multiple items yet to be created. DCR uses this shared set of information to verify compliance for those Template-Based Items submitted in the future.

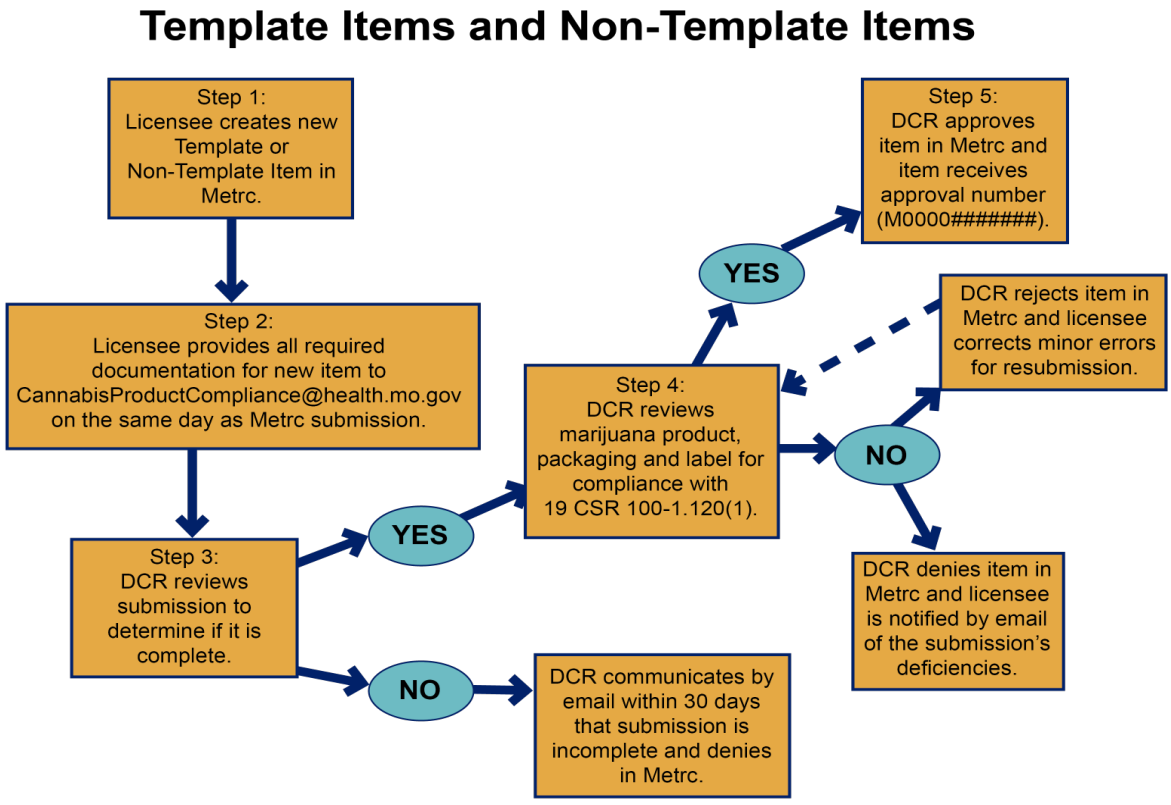
This is intended to limit repetitive submission of the same information and layout. It allows a licensee to submit an item for compliance review and later use the submission as a reference for multiple future Template-Based Item submissions. Reference Figure 1 below which is the flowchart for the Template and Non-Template Items Submission Processes.

Upon DCR approval, the template submission will receive an approval number for the packaging, labeling and product design. This item approval number should never have actual product associated with it as it is not an "usable item" to be used by the licensee for the purpose of retail sales.

After a Template Item receives DCR approval, a licensee will use the item as the "template" to submit Template-Based Items.

> ***Note:*** *For dispensary licensees dispensing marijuana in custom amounts, also referred to as deli style, a licensee may submit a template design that will be used to create template-based packaging for all deli-style transactions. The template design may have a range of unit quantity to cover the different quantities that may be dispensed. Dispensary licensees may create one template for deli-style products that is in the exact same style of packaging (bag, jar, tube, etc.) and packaging design. Licensees may include multiple-size package variations in a single submission as long as this information is detailed and noted on the submission. The licensee is still required to submit a new final packaging item for each strain received into their inventory prior to sale.*

Figure 1



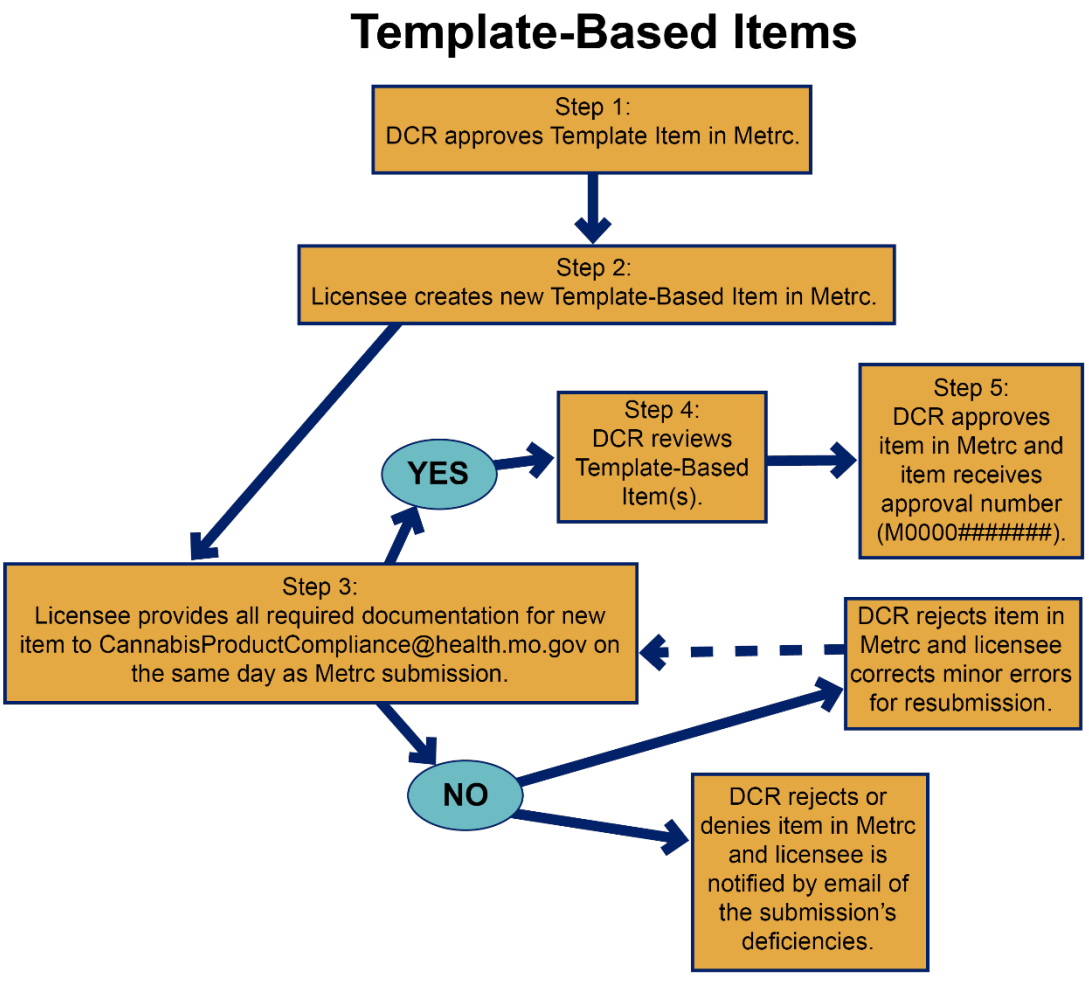
Non-Template Item Submission

A Non-Template Item is a type of Metrc item that is intended to be used for the purpose of retail sales. This type of submission is for an independent review of an individual item and has a review period of up to 60 days. It does not reference an approved Template Item. Reference Figure 1 above which is the flowchart for the Template and Non-Template Items Submission Processes.

Template-Based Item Submission

A Template-Based Item is the “Final Packaging” item to be used by the licensee for the purpose of retail sales. A Template-Based Item begins with a Template Item and is for review of multiple items where the only difference in the items will be strain or flavor of the final packaged product. This type of submission has a review period of up to 60 days. Reference Figure 2 below which is the flowchart for the Template-Based Items Submission Process.

Figure 2



Preparing for Submission

To prepare for submission a licensee should collect the following documentation to complete the submission process:

- Product information.
- Item approval application.
- Approved Template Item name and number (if applicable).
- Photos/files.
    - Product photo.
    - Label photo.
    - Packaging photo or dieline including identification of logos or symbols. A dieline refers to a blueprint needed to ensure the correct layout of a final physical package, showing the placement of all required and optional design elements. This technical drawing serves as a diagram that marks all the folds and cut lines of a package in a flattened form, and should include measurements of the packaging, logos and required labels.
- QR code (if applicable).

The marijuana product, packaging and labeling for the item approved must be identical to the information provided within the submission. With this, DCR understands the need for placeholders within certain areas of the submission. A placeholder is a temporary value used to represent information that will be filled in later. DCR also understands that components such as the label are not printed directly on the packaging but are affixed to the packaging through the use of a sticker. Licensees may use stickers on packaging if it is part of the information approved through the Item Approval Process. The packaging submitted must show the dedicated area that the sticker will be placed.

Additionally, licensees may request alternative placement of “Marijuana”, the universal symbol and label as part of the submission. DCR is unable to approve alternative placement of constitutional or statutory requirements. The alternative placement must meet the intent of the rule and clearly and conspicuously notify the public that the product contains marijuana.

Step-by-Step Submission Process

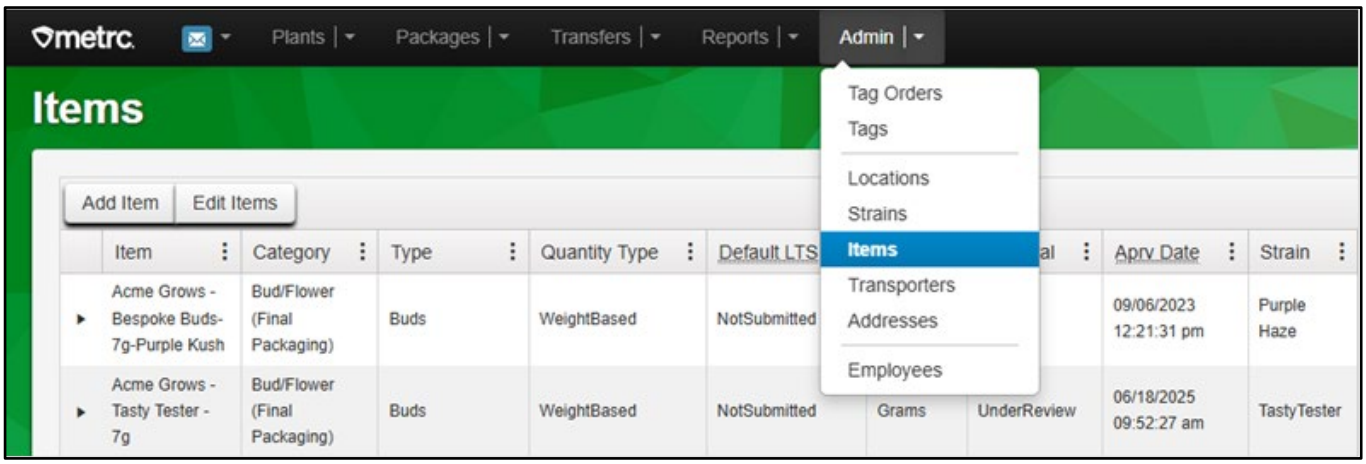
To begin the submission process, a licensee creates a new item in a “Final Packaging” category in Metrc. Reference the Metrc Industry User Guide for additional information on items and other Metrc actions located at https://mo.metrc.com/documents/Metrc_Manual.

Completion of a new item in the “Final Packaging” category will cause automatic submission of the item for compliance review through Metrc.

Step 1: Add Item

Select the Admin dropdown menu on the long black navigation bar, then select “Items”. This is where items can be added or edited, as needed. Reference Figure 3 below which is a screenshot showing how to navigate to the Items page within a menu on the Metrc website.

Figure 3



Step 2: Name

This is a text field to identify the product that will be packaged and distributed. Reference Figure 5, #2 on page 14 which is a screenshot of the Metrc Add Items webpage showing the Name text field.

The following naming nomenclature **must** be used for each item submission based on submission type:

- Template:
  - TEMPLATE - [Brand Name] – [Marijuana Product Name] - [Product Type] – [Intended Total THC (where applicable)] – [Unit Quantity] – [Flavor/Strain].
  - TEMPLATE – [3rd Party] – Deli-Style flower – [Strain].
- Template-Based:
  - [Brand Name] – [Marijuana Product Name] - [Product Type] – [Intended Total THC (where applicable)] – [Unit Quantity] – [Flavor/Strain].
- Non-Template:
  - [Brand Name] – [Marijuana Product Name] - [Product Type] – [Intended Total THC (where applicable)] – [Unit Quantity] – [Flavor/Strain].

Brand Name

Identify the brand for a particular marijuana product to help differentiate the item from similar products in a licensee's inventory.

Examples include, but are not limited to:

- **Acme Eats** - Brookie Bar - Cookie - 100mg - 10ct.
- **Acme Puffs**_Caddy Carts_Vape _0.5g_Cherry Bomb.
- **Acme Grows**: To-Go Prepacks: Prerolls: 7g: 14 count: Golden Goat.

Marijuana Product Name

Identify the individual marijuana product name for a particular brand to help differentiate the item from other products in a licensee's inventory.

Examples include, but are not limited to:

- Acme Eats - **Brookie Bar** - Cookie - 100mg - 10ct.
- Acme Puffs_ **Caddy Carts**_Vape _0.5g_ Cherry Bomb.
- Acme Grows: **To-Go Prepacks**: Prerolls: 7g: 14 count: Golden Goat.

Marijuana Product Type

Identify the individual type of marijuana product.

Examples include, but are not limited to:

- Acme Eats - Brookie Bar - **Cookie** - 100mg - 10ct.
- Acme Puffs_ Caddy Carts_**Vape** _0.5g_ Cherry Bomb.
- Acme Grows: To-Go Prepacks: **Prerolls**: 7g: 14 count: Golden Goat.

Intended Total THC Amount

Identify the intended total amount of THC in a particular marijuana product or marijuana product formulation.

Examples include, but are not limited to:

- Acme Eats - Brookie Bar - Cookie - **100mg**- 10ct.
- Acme Eats - G.O.A.T. Gummies - Gummies - **300mg** - 30ct - Purple Punch.
- Acme Eats: G.O.A.T.ORADE: Sparkling Beverage: **100mg:** 1ct: Lemon Lime.

Unit Quantity

Identify the final marijuana product unit quantity.

Examples include, but are not limited to:

- Acme Eats - Brookie Bar - Cookie - 100mg - **10ct**.
- Acme Eats - G.O.A.T. Gummies - Gummies - 300mg - **30ct** - Purple Punch.
- Acme Puffs_Caddy Cart_Vape_**0.5g**_Cherry Bomb.
- Acme Grows: To-Go Prepacks: Prerolls: **7g**: 14 count: Golden Goat.

Flavor or Strain

Identify the marijuana product flavor or strain.

> ***Note:*** *Botanically-derived terpenes blended to mimic a specific strain are a flavor and should not be identified as a strain. A strain name must match the name the marijuana was initially cultivated under, or the item can be non-strain specific. Strain names cannot be changed.*

Examples include, but are not limited to:

- Acme Eats – G.O.A.T. Gummies – Gummies - 300mg – 30ct - **Purple Punch**.
- Acme Puffs_Caddy Cart_Vape_0.5g_**Cherry Bomb**.
- Acme Grows - To-Go Prepacks- 7g - **Golden Goat**.

Entering and Listing CBD and other Cannabinoids

Identify additional cannabinoids ingredients used within the item name. Licensee may choose to express added cannabinoids in a ratio. The first example is of a Template Item, the following two examples could be either Template-Based or Non-Template Items.

Examples include, but are not limited to:

- TEMPLATE: Acme Eats – Brookie Bar – Cookie – **1CBD:1CBG:2THC** – 100mg – 10ct – [Flavor].
- Acme Eats – Brookie Bar – Cookie – **1:1:2 (CBD:CBG:THC)** – 100mg – 10ct – Snickerdoodle.
- Acme Eats – Brookie Bar – Cookie – (**5mg CBD: 5mg CBG: 10mg THC)** – 100mg – 10ct – Chocolate Chip.

Step 3: Category

This is a dropdown list that features intermediate and final packaging categories. To submit an item for approval, a (Final Packaging) item category must be selected from the drop-down menu. If licensees do not select a (Final Packaging) item category, the item **will not** enter the review queue. The selection of different item categories may populate more data areas underneath “Unit of Measure” to be completed for submission depending on the different categories. Reference Figure 5, #3 on page 14 which is a screenshot of the Metrc Add Items webpage showing the Category drop-down menu.

Item categories are defined in Metrc Support Bulletin MO_IB_0022..

Step 4: Unit of Measure

Items are divided into two categories for unit of measure, weight- or count-based. Reference Figure 5, #4 on page 14 which is a screenshot of the Metrc Add Items webpage showing the unit of measure drop-down menu.

Bud/flower, ground flower, ground shake/trim and shake/trim are required to use weight-based measure.

Concentrates, immature plants, infused edibles, infused non-edibles, infused pre-rolls, raw pre-rolls, seeds and vape cartridges are count-based measure.

If an item belongs to a weight-based category, select the “Unit of Measure” for that item. If the item belongs to a count-based category, select “Each”. Select the correct unit of measure before creating the item.

Step 5: Administration Method

This is a text field where instructions on how to administer the item are recorded. The information included here should match the instructions for use on the label. Reference Figure 5, #5 on page 14 which is a screenshot of the Metrc Add Items webpage showing the Administration Method text field.

Step 6: Unit Weight/Unit THC Content/Unit THC Content Dose

This is a text field where Unit Weight and Unit THC Content or Unit THC Content Dose is recorded. This step is dependent on the item category selected. For infused marijuana products, Unit Weight would be the total weight of the full item, including non-THC ingredients for all servings in the package. Reference Figure 5, #6 on page 14 which is a screenshot of the Metrc Add Items webpage showing the Unit Weight fields including a text field and a drop-down menu for the unit of measure.

Unit THC Content is the total amount of THC in the entire unit.

Unit THC Content Dose is the THC content in a single dose.

For example, a 10-pack of 10mg gummies would have a Unit THC Content of 100mg, and a Unit THC Content Dose of 10mg.

Step 7: Serving Size

This is a text field where serving size is recorded. The information is used to verify the servings and doses per package and instructions for use on the label. Reference Figure 5, #7 on page 14 which is a screenshot of the Metrc Add Items webpage showing the Serving Size text field.

For example: a vape cartridge serving size may be listed as a three-second-long draw.

Step 8: Number of Doses

This is a text field where the total number of doses in a single package is recorded with up to two decimal places. Reference Figure 5, #8 on page 14 which is a screenshot of a Metrc Add Items webpage showing the Number of Doses text field.

Step 9: Public Ingredients

This is a text field where every ingredient, including solvents used in the extraction process, is recorded. Reference Figure 5, #9 on page 14 which is the screenshot of the Metrc Add Items webpage showing the Public Ingredients text field.

For Template Items, all ingredients including placeholders for variable information related to flavor or strain are required. For example: "…salt, sugar, natural [flavor] flavoring" or "[strain] THC Flower" should be included on the Template Item's label. When Template-Based Items are produced, the label on the physical product should include the actual ingredients used, replacing the placeholders with information specific to that item and batch.

> ***Note:*** *Metrc will not allow special characters such as symbols or Greek letters.*

If the product ingredient list surpasses the 1,000-character limit, continue to list ingredient by ingredient in descending order within the "Item Ingredients" field(s) **after** the "Public Ingredients" field has been exhausted.

To add "Item Ingredients":

- Locate and select the "+" button at the bottom left corner of the item creation window titled "(ingredient)" to add additional ingredients one at a time.
- Change the number in the ingredient box, **prior** to selecting the "+" button. This will add the entered number of additional lines and reduce the number of clicks needed to complete the process.

Reference Figure 4 on page 12 which is a screenshot of the bottom of the Add Item Webpage showing the add additional ingredients button and the text field that will appear when the "+" button is selected.

Figure 4

Step 10: Add Required Photos

Upload product, label and packaging PDF or JPEG (referred to as photos within Metrc) one file per requested photo.

Product Photo: The physical, final marijuana product should be shown on a solid neutral-colored background in a single photo. The product photo must provide a clear and detailed image of the entire final marijuana product intended for distribution. Where there are multiple servings and/or doses of the same flavor/strain within a final marijuana product unit, licensees shall submit a photo of a single serving and/or dose. Reference Figure 5, #10 on page 14 which is a screenshot of the Metrc Add Items webpage showing the area for licensees to upload product, label and packaging photos as well as an optional text field for a written photo description.

- For products with a method of administration such as, but not limited to, all-in-one vape cartridges or prerolls, the photo must reflect the placement of the word “Marijuana” and the universal symbol on the method of administration as required.
- Product photo for a Template Item may vary due to changes in strain or flavor. In this instance, licensees should upload a photo of a single unit that is a representation of the final product.

Common examples of how a licensee could take a single photo to represent the entire product:

- If a licensee produces a pack of five Golden Goat prerolls, the licensee must submit a photo of a single preroll.
- If a licensee produces a pack of 10 cherry flavor gummies, the licensee must submit a photo of a single gummy.
- If a licensee produces a liquid product such as a beverage or lotion, the licensee must submit a photo of the liquid in a neutral-color container.
- If the licensee uses vape cartridge hardware that has the word “Marijuana” and the universal symbol on different sides, the licensee should submit a single packaging photo by placing two vape cartridge hardware in a single shot with one hardware facing forward and another hardware facing backward to encompass the entirety of the method of administration.
- If the licensee has created a template for a flower product, the licensee may submit a product photo of any strain meant to represent the intended bud/flower product.

Label Photo: This means a single photo of the label information in the order required by rule, commonly known as the “compliance label”, “testing label” or “label required by rule.” Reference Figure 5, #10 on page 14 which is a screenshot of the Metrc Add Items webpage showing the area for licensees to upload product, label and packaging photos.

- Input placeholders for any information that is not yet know at the time the item is being created for submission. Common placeholders would be for best if used by date, tag numbers and cannabinoid values.
- Ordered ingredients are not variable information and should be included in the label photo.
- Licensees are not required to submit unique labels when creating Template-Based Items provided that the label information from the Template Item submission is accurate for the Template-Based Item. Licensees may submit the same label file that was submitted with the original approved Template Item with each subsequent Template-Based Item. When Template-Based Items are produced, the label applied to the product should be completely filled in with information consistent with the required testing results for that batch.

Packaging Photo/Dieline: A single photo of the physical final marijuana packaging, including the container or method of administration, all layers of packaging, printed content, display panels and wrappers on a solid, neutral-color background. Reference Figure 5, #10 on page 14 which is a screenshot of the Metrc Add Items webpage showing the area for licensees to upload product, label and packaging photos.

The packaging photo must provide a clear and detailed image of the entire final marijuana packaging dieline or mockup and must indicate specific placement and measurements of all packaging, labeling and design components.

- Where applicable, the packaging photo must include any wrappers included within the package.
- For Template-Based submissions only, the licensee will need to upload information showing the approved template number and full template name for the original Template Item that it is based on for the packaging photo/dieline.

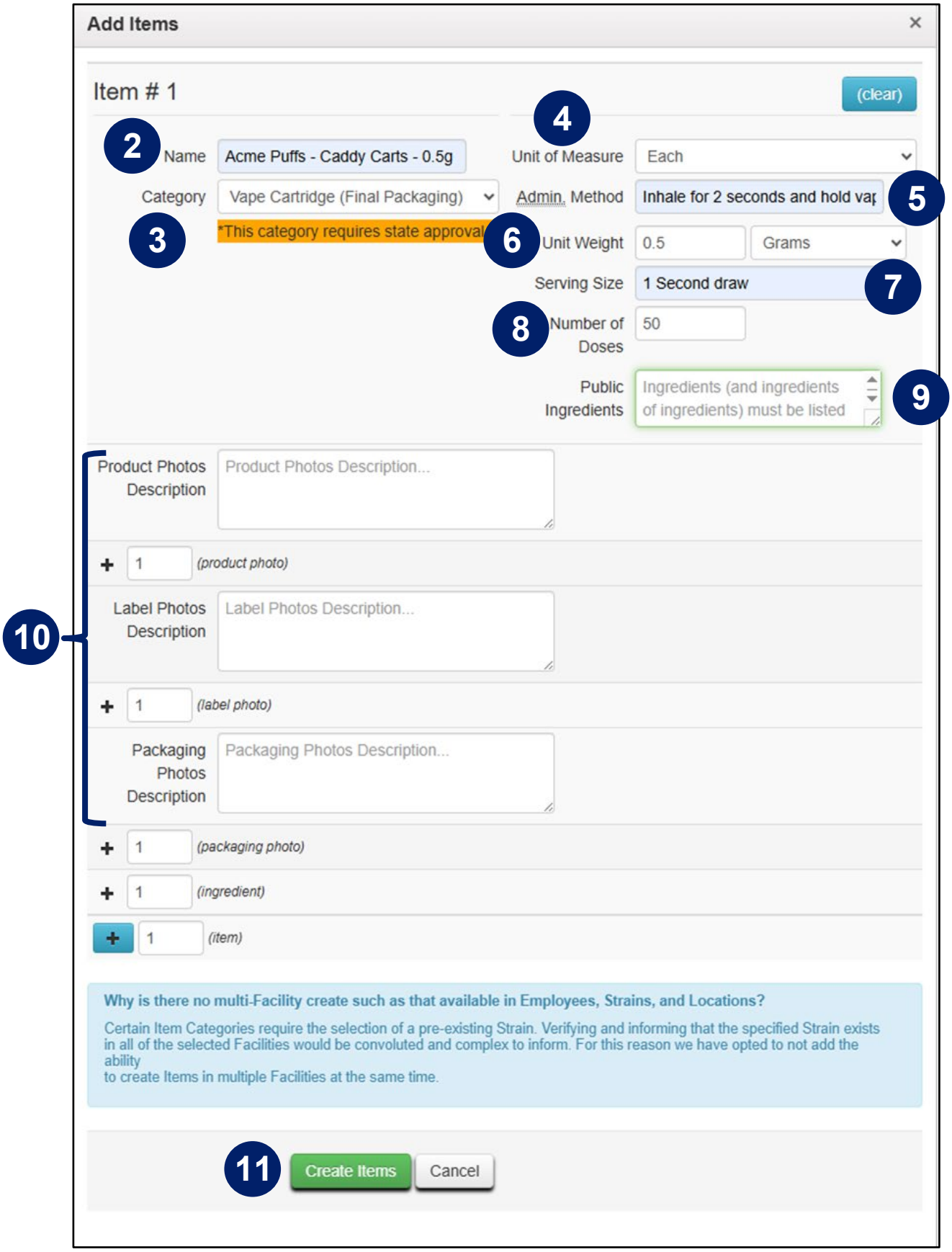
Common examples of how a licensee could take a single photo to represent the packaging:

- If the licensee uses a resealable pouch that has two sides and a bottom where DCR approved the design with printed content on both sides of the packaging and the bottom, the licensee could submit a single packaging photo by placing three packages in a single shot with one package facing forward, one facing backward and another package showing the bottom to encompass the entirety of the packaging.
- If the licensee uses a resealable pouch that contains individually-wrapped marijuana-infused candies, DCR expects the wrapper for those candies to be included in the packaging photo with applicable sides of the packaging.

Step 11: Item Created in Statewide Track and Trace System

Once all required fields have been completed, select the “Create Items” button at the bottom of the item window. After the item is created, it will enter the queue to begin the Item Approval Process in Metrc. Reference Figure 5, #11 on page 14 which is a screenshot of the Metrc Add Items webpage showing the Create Items button which when selected will finalize the Metrc portion of item submission.

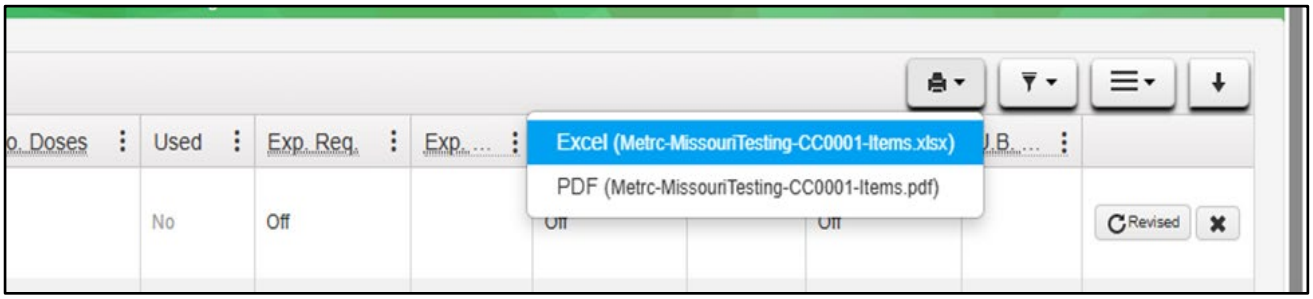
Figure 5


Add Items
Item # 1
(clear)
2
Name
Acme Puffs - Caddy Carts - 0.5g
Category
Vape Cartridge (Final Packaging)
3
*This category requires state approval
4
Unit of Measure
Each
Admin. Method
Inhale for 2 seconds and hold vap
5
6
Unit Weight
0.5
Grams
Serving Size
1 Second draw
7
8
Number of Doses
50
Public Ingredients
Ingredients (and ingredients of ingredients) must be listed
9
10
Product Photos Description
Product Photos Description...
1
(product photo)
Label Photos Description
Label Photos Description...
1
(label photo)
Packaging Photos Description
Packaging Photos Description...
1
(packaging photo)
1
(ingredient)
1
(item)
Why is there no multi-Facility create such as that available in Employees, Strains, and Locations?
Certain Item Categories require the selection of a pre-existing Strain. Verifying and informing that the specified Strain exists in all of the selected Facilities would be convoluted and complex to inform. For this reason we have opted to not add the ability
to create Items in multiple Facilities at the same time.
11
Create Items
Cancel

Step 12: Template-Based Item Excel Download (optional)

After a licensee enters all Template-Based Items for an approved template, the licensee may export the data to an Excel file by clicking “Export Data to File” button. Reference Figure 6 below which is a screenshot of the Metrc webpage showing how to select an Excel file download.

Figure 6



Step 13: Complete Item Approval Application

Completed, signed and dated application with supporting documentation (if applicable) including:

- Dieline drawings.
- Logo submissions.
- QR code.

Reference the Item Approval Application.

Licensees are not required to submit child-resistant certifications, packaging specification sheets, packaging manufacturer's food grade statements or certifications of FDA compliance within the item submission process. Licensees are required to always maintain documentation for compliance verification.

Step 14: Submit Item Approval Application to DCR Product Compliance

After submission through Metrc, licensees are required to provide supporting documentation by email to CannabisProductCompliance@health.mo.gov for each “Final Packaging” submission. If the supporting documentation is not received the same day, DCR may deny the request as an incomplete submission.

Email submissions should follow the format list below for the subject line to assist in timely processing:

- Non-Template Item: [License Number] – [Brand Name] – [Marijuana Product Name] – [Intended Total THC (where applicable)] – [Unit Quantity] – [Flavor / Strain].
- Template Item: [License Number] TEMPLATE – [Brand Name] – [Marijuana Product Name] – [Intended Total THC (where applicable)] – [Unit Quantity] – [Flavor / Strain].
- Template-Based Item(s): [License Number] – [Approved template item approval number] – [Template name in Metrc].

For Template Items or Non-Template Items, licensees should only submit documentation for one item submission per email. For Template-Based Items, licensees can submit multiple items all based on the same approved template in a single submission.

Licensees submitting a Template or Non-Template Item need to submit the Item Approval application and required documentation through email.

Licensees submitting a Template-Based Item need to submit the Item Approval application and the exported Excel list from Metrc through email. Refer to Figure 6 on page 15 of this guide which is a screenshot of the Metrc webpage showing how to select an Excel file download.

For Template-Based Items created in Metrc on different dates, licensees will need to email separate submissions. For submissions made over multiple days, the licensee should email a completed application and list of the items created at the end of each day to ensure all required documents are emailed on the same date as the creation date in Metrc.

Item Status Notification

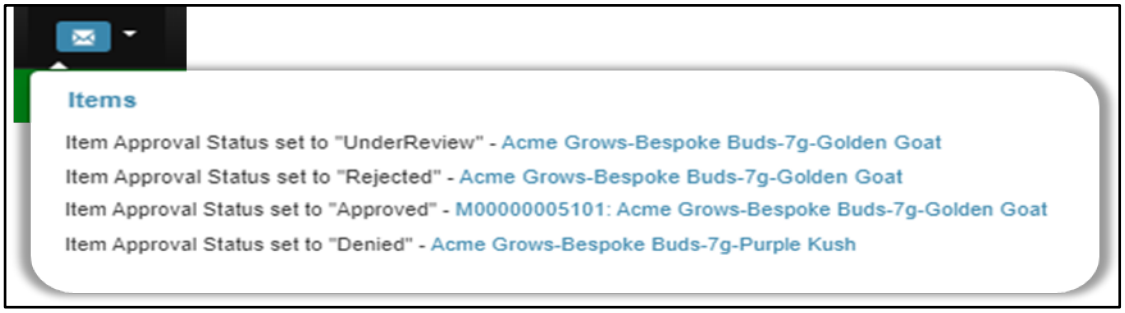
There are six possible statuses as an item moves through the Item Approval Process:

- Ready: The item is submitted in Metrc for the Item Approval Process.
- Under Review: The item has been placed in queue and awaiting DCR review.
- Rejected: DCR has identified a minor error during review process and the licensee is allowed to correct the error.
- Approved: DCR has approved the item product, packaging and labeling design as a whole.
- Reset: DCR or licensee has identified a minor error after item has been approved, and the licensee is allowed to correct the error.
- Denied: DCR has determined the submission was incomplete and/or item product, packaging and labeling design did not comply with 19 CSR 100-1.120(1).

Licensees should refer to the “Approval” column on the “Items” screen to verify the status of a “Final Packaging” item’s product, packaging and labeling design. Licensees can find the item approval number in front of the item name in the “Item” column. Reference Figure 7 on page 17 which is a screenshot of the various status options for an item.

The “Approval Date” column provides a date/time stamp for the last action taken with the item in Metrc. This date/time stamp will change each time DCR updates the state of item to either under review, rejected, approved or denied.

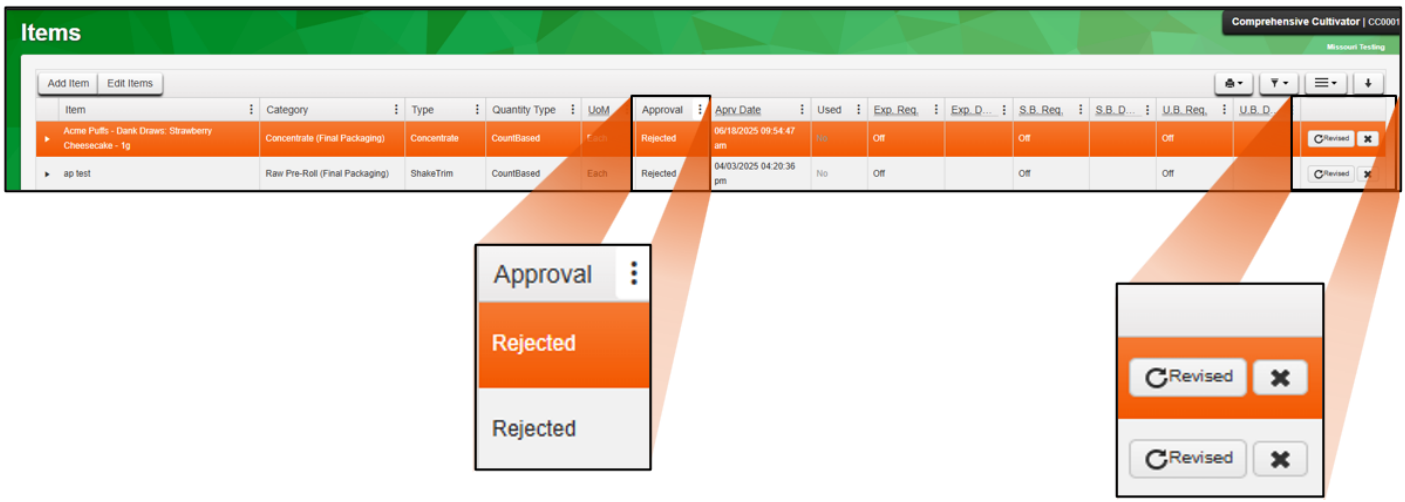
Figure 7



Rejected Submission

If the submission has a minor error, it may be rejected to allow the licensee to correct the error. Corrections are made to the submission by selecting the rejected item and selecting “Edit Items” button. An edit items pop-up window will appear with the same fields as shown in Figure 4.

Figure 8



Once all edits have been made, select the “Save Items” button at the bottom of the window. To complete the licensee must click the “Revised” button. This allows DCR staff to continue the review process without resubmission. Reference Figure 8 below which is a screenshot displaying an item with a rejected status and the ”Revised” button used when deficiencies identified by DCR have been corrected by the licensee.

Approved Submission

Once an item in a “Final Packaging” category has been approved through the Item Approval Process, the item will display an approved status. Licensees may begin using approved items when creating packages in Metrc for transfer to licensed dispensary facilities.

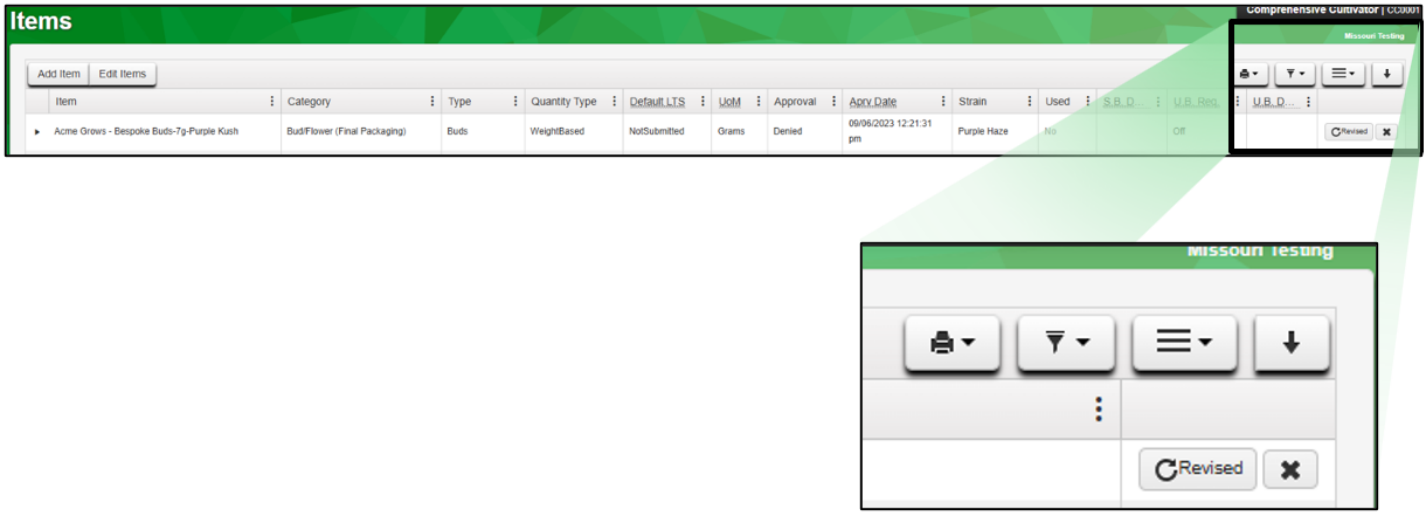
Denied Submission

If the submission is determined to be an incomplete or non-compliant, the item will display a denied status.

Resubmission of Item

To resubmit a previously denied item, licensees must first delete the non-compliant item in Metrc by clicking the "**X**" on the far right of the "Items" screen. Once the item has been deleted, the licensee will follow the steps to submit an item, starting at Step 1 in this guide. Reference Figure 9 below which is a screenshot of the Metrc website displaying the "**X**" button used to discontinue an item from a licensee's Metrc Items inventory.

Figure 9



Product Compliance Team

For questions or feedback regarding packaging, labeling and product design compliance or the Item Approval Process, email CannabisProductCompliance@health.mo.gov.

Licensees can find additional information on our website including average processing days at https://health.mo.gov/safety/cannabis/facility-comms-guidance.php.